



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

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**San Francisco, CA 94105-3901**

May 13, 2008

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Subject: Draft Environmental Impact Statement (DEIS) Orleans Community Fuels  
Reduction and Forest Health Project, Humboldt County, CA (CEQ#  
20080105)

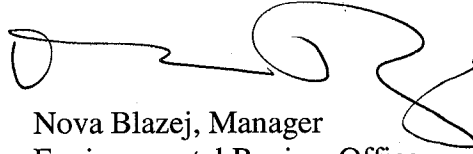
The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA supports the effort to reduce hazardous fuel conditions, restore fire-adapted ecosystem functions, improve the structure and function of riparian reserves, and improve forest conditions of the Panamnik World Renewal Ceremonial District. We commend the joint goal of ensuring full compliance with Aquatic Conservation Strategy objectives while addressing the need to protect the community of Orleans. Project features such as the high percent of proposed hand treatments, retention of 60% canopy closure in suitable late-successional habitat, and no new road construction or reconstruction in stream channels or riparian areas are laudible. These project features will help minimize adverse effects in riparian reserves and sedimentation of downstream drinking water sources and critical fish habitat.

We have rated the DEIS as Lack of Objections (LO) (see enclosed "*Summary of Rating Definitions*"). We recommend the final environmental impact statement (FEIS) provide additional information on potential air quality effects and worker exposure to naturally occurring asbestos. To ensure local community economic benefits, we recommend the Forest Service focus on the use of local stewardship contracts which utilize community and Tribal labor pools. Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one hard copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3846 or Laura Fujii, the lead reviewer for this project. Laura can be reached at (415) 972-3852 or [fujii.laura@epa.gov](mailto:fujii.laura@epa.gov).

Sincerely,



Nova Blazej, Manager  
Environmental Review Office

Enclosure:  
Summary of EPA Rating Definitions  
Detailed Comments

cc: Tyrone Kelly, Forest Supervisor, Six Rivers National Forest  
Karuk Tribe of California  
Orleans Fire Safe Council  
Mid-Klamath Watershed Council

# SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

## ENVIRONMENTAL IMPACT OF THE ACTION

### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

## ADEQUACY OF THE IMPACT STATEMENT

### *Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

**EPA DETAILED DEIS COMMENTS ORLEANS COMMUNITY FUELS REDUCTION AND FOREST HEALTH PROJECT, SIX RIVERS NATIONAL FOREST, HUMBOLDT COUNTY, CA, MAY 13, 2008**

***Provide a more detailed description of proposed treatment prescriptions.*** The DEIS describes the acres and types of fuel and forest health treatments without describing specific treatment features in the description of alternatives (Chapter 2). For instance, the DEIS does not describe the maximum allowable tree size to be harvested or thinned, slope restrictions by type of treatment, or the desired spacing between trees.

***Recommendations:***

We recommend the FEIS provide a more detailed description of the proposed silvicultural prescriptions in the description of alternatives. For example, describe the maximum allowable tree size to be harvested or thinned and slope restrictions for different treatment methods (hand, ground-based, skyline, endline, helicopter). While we appreciate Table B-3 which describes the proposed silvicultural treatments by unit (p. B-15 to B-24), we recommend the FEIS include a description of the underlying reason for specific treatments in specific units. For instance, describe the reasons for ground-based and helicopter logging in the specified treatment units.

***Describe potential emissions and air quality effects from equipment, harvest activities, and use of native surfaced roads.*** The description of potential air quality effects only describes compliance with the North Coast Unified Air Quality Management District's prescribed burn and smoke regulations (p. 32). A description of existing air quality conditions or the potential effects of equipment emissions, dust generated by fuel treatment activities, or traffic-generated dust is not provided.

***Recommendation:***

We recommend the FEIS include an effects analysis section on air quality. Include in this section a description of existing air quality conditions and potential effects from equipment emissions, fuel treatment activities, and traffic on native surfaced roads. We recommend the FEIS describe whether the Lower Middle Klamath River canyon is subject to inversion conditions and the potential for accumulations of particulate matter and equipment emissions within the canyon.

***Describe project design features to protect existing cultural resources.*** The DEIS states that cultural resources (e.g., basket making material) within the Panamint World Renewal Ceremonial District would be protected from proposed thinning through project design features (p. 20).

***Recommendation:***

We recommend the FEIS provide a specific description of these proposed design features and demonstrate how cultural resources such as bear grass, hazel, and willow would be protected or enhanced.

***Provide information on the potential exposure of workers to naturally occurring asbestos.*** The DEIS describes the presence of serpentine rocks (p. 53) and serpentine barrens (p. 39) in the project area. It is important to note that serpentine and other soils in the Sierra Nevada have been found to contain chrysotile and amphibole asbestos. Asbestos levels less than 1.00 percent in soil can generate airborne asbestos at hazardous levels. Given the use of native surfaced roads and proposal to treat 1,374 acres by hand (thinning, pruning, piling brush), we are concerned with the potential exposure of workers to naturally occurring asbestos.

***Recommendations:***

Although serpentine soils and barrens may be limited, it is important to protect human health by limiting the exposure of workers to this air pollutant. We recommend that the Forest Service review the asbestos occurrence information on the California Geological Survey at [http://www.consrv.ca.gov/cgs/minerals/hazardous\\_minerals/asbestos/index.htm](http://www.consrv.ca.gov/cgs/minerals/hazardous_minerals/asbestos/index.htm) and the California Air Resources Board (CARB) regulations and guidance at <http://www.arb.ca.gov/toxics/asbestos/asbestos.htm>.

We recommend the FEIS describe whether naturally occurring asbestos may be present in treatment units or along project access routes. If applicable, provide information on potential exposure mechanisms and whether California Air Resources Board regulations would be applicable.